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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NATIONAL FOOTBALL LEAGUE, NFL
PROPERTIES LLC, NEW ENGLAND
PATRIOTS L.P., OAKLAND RAIDERS,
LTD, and ST. LOUIS RAMS PARTNERSHIP,

Plaintiffs,

v.

DANIEL W. BASE, STACY L. BASE, ALL
STAR SPORTS ENTERPRISES, and ALL
STAR SPORTS COLLECTIBLES,

Defendants.

Case No.

CV4 1776

COMPLAINT

JURY DEMANDED



04-CV-01776-CMP

Plaintiffs National Football League ("NFL"), NFL Properties LLC ("NFLP"), New
England Patriots L.P. ("New England Patriots" or "Patriots"), Oakland Raiders, Ltd. ("Oakland
Raiders" or "Raiders"), and St. Louis Rams Partnership ("St. Louis Rams" or "Rams") for their
Complaint, allege as follows, upon knowledge with respect to themselves and their own acts and
upon information and belief with respect to all other matters:

I. PRELIMINARY STATEMENT

1. This action arises from defendants' willful and blatant counterfeiting and
unauthorized use of trademarks owned or controlled by the NFL, NFL Properties LLC, the New
England Patriots, the Oakland Raiders and the St. Louis Rams to create the false impression that

ORIGINAL

COMPLAINT - JURY DEMANDED

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STOKES LAWRENCE, P.S.
800 FIFTH AVENUE, SUITE 4000
SEATTLE, WASHINGTON 98104-3119
(206) 476-6000

317456

1 Defendants' commercial activities are affiliated with the NFL, the Patriots, the Raiders, the Rams
2 and the NFL's annual Super Bowl game. In particular, Defendants are using the world famous
3 SUPER BOWL trademark, the NEW ENGLAND PATRIOTS, OAKLAND RAIDERS, and ST.
4 LOUIS RAMS word marks and design logos and other NFL trademarks to offer for sale
5 counterfeit rings.

6 2. These counterfeit rings have no genuine association with the NFL, NFL Properties
7 LLC, the New England Patriots, the Oakland Raiders or the St. Louis Rams.

8 3. Defendants' conduct constitutes a bad faith attempt to trade upon the enormous
9 goodwill associated with the NFL's SUPER BOWL and NFL team trademarks by offering for
10 sale counterfeit rings bearing the SUPER BOWL, Vince Lombardi Super Bowl Trophy, and
11 PATRIOTS, RAIDERS and RAMS trademarks. Defendants have been repeatedly informed of
12 Plaintiffs' prior and superior trademark rights. Nonetheless, and despite Plaintiffs' efforts to
13 resolve this matter amicably (and even after assurances from Defendants that they would cease
14 the illegal and offending activity), Defendants have refused to discontinue their use of the
15 Plaintiffs' marks or to withdraw the counterfeit product from the marketplace, and indeed appear
16 to have expanded their infringing activities. As a result, Plaintiffs filed the instant action to
17 protect their valuable intellectual property rights.

18 4. This is an action at law and in equity to remedy acts of, *inter alia*, counterfeiting,
19 trademark infringement, false designation of origin and misrepresentation in commerce,
20 trademark dilution, unfair competition, and violation of the Washington State Consumer
21 Protection Act, all caused by Defendants' manufacture, offering for sale and sale of counterfeit
22 and infringing product bearing the Plaintiffs' registered trademarks, and other activities
23 knowingly, willfully and intentionally undertaken by Defendants for the purpose of usurping the
24 value and goodwill embodied by Plaintiffs' trademarks. Defendants' activities have caused, and
25 will continue to cause, irreparable harm to the NFL and its Member Clubs, entitling Plaintiffs to
26 injunctive relief, damages, profits of the infringers, attorneys' fees and the other relief provided
27 for in 15 U.S.C. §§ 1117 and 1125.

II. THE PARTIES

5. Plaintiff NFL is an unincorporated association of thirty-two member clubs (the "Member Clubs"), with its principal place of business at 280 Park Avenue, New York, New York 10017. Each of the Member Clubs owns and operates a professional football team that provides entertainment services to the public in the form of competitive professional football games in various locations throughout the United States.

6. Plaintiff NFL Properties LLC ("NFLP") is a limited liability corporation organized and existing under the laws of Delaware with its principal place of business at 280 Park Avenue, New York, NY 10017. NFLP is responsible for promoting, protecting and licensing the trademarks of the NFL and its Member Clubs to third parties.

7. Plaintiff New England Patriots is a limited partnership organized and existing under the laws of Delaware with its principal place of business at Gillette Stadium, One Patriot Place, Foxboro, Massachusetts, 02035. The New England Patriots football franchise owns and operates a professional football team, which provides entertainment services to the public in the form of competitive football games. The New England Patriots football franchise is one of the thirty-two Member Clubs of the NFL.

8. Plaintiff Oakland Raiders, Ltd. is a California limited partnership with its principal place of business at 1220 Harbor Bay Parkway, Alameda, California 94502. The Oakland Raiders football franchise owns and operates a professional football team, which provides entertainment services to the public in the form of competitive football games. The Oakland Raiders football franchise also is one of the thirty-two Member Clubs of the NFL.

9. Plaintiff St. Louis Rams Partnership is a general partnership organized and existing under the laws of Delaware with its principal place of business at 1 Rams Way, St. Louis, Missouri 63045. The St. Louis Rams football franchise also owns and operates a professional football team and provides related entertainment services, and is one of the Member Clubs of the NFL.

10. Upon information and belief, Defendant All Star Sports Enterprises is a

1 Washington unincorporated entity with its principal place of business at 18930 Bothell Everett
2 Highway, Apartment E102, Bothell, Washington.

3 11. Upon information and belief, Defendant All Star Sports Collectibles is a
4 Washington unincorporated entity with its principal place of business at 18930 Bothell Everett
5 Highway, Apartment E102, Bothell, Washington.

6 12. Upon information and belief, Defendants Daniel W. Base and Stacy L. Base, and
7 the marital community thereof, reside within King County, Washington, at 18930 Bothell Everett
8 Highway, Apartment E102, Bothell, Washington.

9 13. Defendants also have been associated with at least two additional Washington
10 State addresses, P.O. Box 12517, Mill Creek, Washington 98082 and 10807 41st Drive SE,
11 Everett, WA 98208.

12 III. JURISDICTION AND VENUE

13 14. This is a civil action for counterfeiting, trademark infringement, false designation
14 of origin and misrepresentation in commerce, trademark dilution, unfair competition, and
15 violation of the Washington State Consumer Protection Act, and arises under the federal Lanham
16 Act, 15 U.S.C. § 1051 *et seq.*, federal common law, and Washington State statutory and common
17 law.

18 15. This Court has jurisdiction over the subject matter of this complaint pursuant to
19 28 U.S.C. § 1338(a) and (b) because the complaint involves claims for counterfeiting, trademark
20 infringement, false representation of origin and false representation, and unfair competition
21 under the federal Lanham Act, 15 U.S.C. § 1051 *et seq.*

22 16. This Court has supplemental jurisdiction over the Washington State claims under
23 28 U.S.C. § 1367.

24 17. This Court has jurisdiction over the Defendants pursuant to RCW 4.28.185, as
25 Defendants reside and are located within this state, have transacted business in this state, and
26 have committed tortious acts within this state.

27 18. Venue in this district is proper pursuant to 28 U.S.C. § 1391(b) & (c) and

§ 1400(a) as a substantial part of the events giving rise to Plaintiffs' claims occurred in this district and Defendants reside and are found within this district.

IV. FACTS

The NFL's Well-Known SUPER BOWL and Vince Lombardi Super Bowl Trophy Trademarks

19. The NFL brand of professional football and the identifying names, logos and other indicia associated with the NFL, including the SUPER BOWL trademark, are enormously popular with both sports fans and the general public. NFL football is, and for many years has been, the most popular spectator sport in the United States. The SUPER BOWL game has practically achieved the status of a national holiday, inspiring social events throughout the weekend on which it is held. The ultimate goal of each Member Club is to appear in, and win, the SUPER BOWL championship game. Plaintiffs, the print and broadcast media, and the general public have used the mark SUPER BOWL millions of times when referring to the NFL and its championship game. As a result, licensees, sponsors and advertisers pay significant fees to use the NFL's famous SUPER BOWL mark, and consumers worldwide identify the mark SUPER BOWL exclusively with Plaintiffs and the NFL Member Clubs.

20. The NFL and the Member Clubs derive substantial revenue from game admission fees and from national television and radio broadcast rights to games, including the SUPER BOWL game. Millions of persons attend the games each year, and millions more follow the NFL, its Member Clubs and NFL games in the electronic and print media and access and download information related to the games via the Internet, including at the NFL's Web site at www.superbowl.com. The NFL and its Member Clubs have invested substantial sums of money promoting their games, including the SUPER BOWL game.

21. As a result, the SUPER BOWL trademark is instantly recognizable to millions of consumers across the United States and the world. Consequently, the SUPER BOWL trademark has enormous marketing value to Plaintiffs. Given the enormous popularity of NFL football in general, and the SUPER BOWL game in particular, a license to use the SUPER BOWL

1 trademark is a highly coveted and valuable commercial asset precisely because it conveys to
2 consumers the message that Plaintiffs sponsor or endorse the licensed product.

3 22. Beginning with the SUPER BOWL III game in 1969, each year's SUPER BOWL
4 championship game has been identified with a roman numeral in conjunction with the words
5 "Super Bowl". Plaintiffs' use of roman numerals in conjunction with the NFL's SUPER BOWL
6 mark also renders the mark instantly recognizable to consumers as being sponsored or endorsed
7 by Plaintiffs.

8 23. The Vince Lombardi Super Bowl Trophy also has achieved widespread
9 recognition in connection with Plaintiffs' SUPER BOWL championship games. The Vince
10 Lombardi Super Bowl Trophy, including its distinctive design and silhouette, is known as
11 representing Plaintiff NFL and the SUPER BOWL championship teams.

12 24. Plaintiff NFL owns the following federal trademark registrations for the SUPER
13 BOWL mark and variations thereof:

<u>Registration Number</u>	<u>Mark</u>	<u>International Class</u>	<u>Date of First Use</u>
0,846,056	SUPER BOWL	028	12/06/66
0,882,283	SUPER BOWL	041	01/15/67
1,226,261	VINCE LOMBARDI TROPHY NFL SUPER BOWL and Design	041	05/07/74

20
21 Registration numbers 846,056, 882,283, and 1,226,261 are incontestable pursuant to Section 15
22 of the Lanham Act, 15 U.S.C. § 1065. Copies of the certificates for these federal trademark
23 registrations are attached hereto as Exhibit 1. In addition, Plaintiff NFL owns a pending federal
24 application for the SUPER BOWL mark in connection with articles of clothing in International
25 Class 025 (Serial No. 76/572,704, Date of First Use: 01/30/1970). Plaintiffs' rights in the mark
26 SUPER BOWL are well established at common law.
27

25. Based on Plaintiffs' many years of advertising, promotional and marketing efforts, which have resulted in widespread and favorable public acceptance and recognition for the NFL brand of professional football, the SUPER BOWL trademark has become one of the most famous and prestigious trademarks in the United States.

26. Plaintiff NFL also is the owner of the following Washington State trademark registration:

<u>Registration Number</u>	<u>Mark</u>	<u>International Class</u>	<u>Date of First Use</u>
032384	SUPER BOWL	014	00/1967





A copy of the certificate for this Washington State trademark registration is attached hereto as **Exhibit 2.**

New England Patriots' Well-Known PATRIOTS Trademarks

27. The New England Patriots football franchise was established in 1959, then under the name Boston Patriots. Renamed the New England Patriots in 1971, the New England Patriots franchise is among the NFL leaders in fan attendance and sold-out ticket seasons. In the course of its more than four-decade history, the Patriots franchise has played in four Super Bowl championship games. In Super Bowl XXXVI in 2002, the New England Patriots defeated the St. Louis Rams by a score of 20-17. In Super Bowl XXXVIII in 2004, the Patriots defeated the Carolina Panthers 32-29, and were presented with the Vince Lombardi Trophy for the second time in three years.

28. Plaintiff New England Patriots owns the following federal trademark registrations (the "PATRIOTS Marks"):

<u>Registration Number</u>	<u>Mark</u>	<u>International Class(es)</u>	<u>Date of First Use</u>
0948574	PATRIOTS	016	07/13/1960
0949536	PATRIOTS	041	02/05/1960

<u>Registration Number</u>	<u>Mark</u>	<u>International Class(es)</u>	<u>Date of First Use</u>
0995095	NEW ENGLAND PATRIOTS	041	05/05/1971
1884852	NEW ENGLAND PATRIOTS	016 025	09/00/1971 05/00/1971
2035889		016 025	05/00/1993 04/00/1993
2029693		016 025 041	05/00/1993 04/00/1993 09/00/1993
2711199		041	09/00/1993
2755546		009 016 025 028 041	04/00/1993 09/00/1993 04/00/1993 09/00/1993 09/00/1993
Registrations numbers 948,574; 949,536; 995,095; 1,884,852; 2,035,889; 1,295,023; 2,043,974;			

and 2,029,693 are incontestable pursuant to Section 15 of the Lanham Act, 15 U.S.C. § 1065.

Copies of the certificates for these federal trademark registrations are attached hereto as

Exhibit 3.

29. Plaintiff New England Patriots also is the owner of the following Washington State trademark registrations:

<u>Registration Number</u>	<u>Mark</u>	<u>International Class</u>	<u>Date of First Use</u>
032390	PATRIOTS	014	09/1993
032391		014	09/1993



Copies of the certificates for these Washington State trademark registrations are attached hereto as **Exhibit 4.**

30. In addition to its aforementioned trademark registrations, the New England Patriots franchise owns common law rights in its PATRIOTS Marks by virtue of their long and exclusive use.




31. Over more than forty years, the Patriots franchise has invested substantial resources in building public recognition in the PATRIOTS Marks. As a result, the PATRIOTS Marks are recognized by fans around the world as signifying an association with the New England Patriots football franchise and with Plaintiffs NFL and NFLP.

Oakland Raiders' Well-Known RAIDERS Trademarks

32. The Oakland Raiders football franchise was established in 1960. In the course of its more than four-decade history, the Oakland Raiders football franchise has become one of the most storied teams in the NFL, playing in five Super Bowl championships and capturing three

World Championships in Super Bowls XI, XV, and XVIII.

33. Plaintiff Oakland Raiders owns, *inter alia*, the following federal trademark registrations (the "RAIDERS Marks"):

<u>Registration Number</u>	<u>Mark</u>	<u>International Class(es)</u>	<u>Date of First Use</u>
1,919,846	OAKLAND RAIDERS	025	09/00/1991
1,771,383		016 025	09/00/1970 02/00/1970
975,685		041	08/00/1960
974,730		041	07/00/1960
731,309	RAIDERS	041	07/00/1960

Registrations numbers 1,919,846; 1,771,383; 975,685; 974,730; and 731,309 are incontestable pursuant to Section 15 of the Lanham Act, 15 U.S.C. § 1065. Copies of the certificates for these federal trademark registrations are attached hereto as Exhibit 5.

34. Plaintiff Oakland Raiders also is the owner of the following Washington State trademark registrations:

<u>Registration Number</u>	<u>Mark</u>	<u>International Class(es)</u>	<u>Date of First Use</u>
032386	RAIDERS	014	09/1993
032385		014	09/1993



Copies of the certificates for these Washington State trademark registrations are attached hereto as **Exhibit 6**.

35. In addition to its aforementioned trademark registrations, the Oakland Raiders franchise owns common law rights in its RAIDERS Marks by virtue of their long and exclusive use.

36. Over more than forty years, the Raiders franchise has invested substantial resources in building public recognition in the RAIDERS Marks. As a result, the RAIDERS Marks are recognized by fans around the world as signifying an association with the Oakland Raiders football franchise and with Plaintiff's NFL and NFLP.

St. Louis Rams' Well-Known RAMS Trademarks

37. The Rams football team, which is one of the NFL's oldest member clubs, was founded in 1937. Over its nearly seven decades of existence, the Rams team has reached the Super Bowl championship game three times. The St. Louis Rams triumphed in Super Bowl XXXIV championship game in January 2000. In 2002, the St. Louis Rams returned to the Super Bowl.

1 38. Plaintiff St. Louis Rams owns, *inter alia*, the following federal trademark
2 registrations (the "RAMS Marks"):

<u>Registration Number</u>	<u>Mark</u>	<u>International Class(es)</u>	<u>Date of First Use</u>
2,824,202	ST. LOUIS RAMS	025	04/12/1995
2,808,932		028	6/00/2000



2,565,679

016

04/30/2000



2,541,067

025

04/30/2000



<u>Registration Number</u>	<u>Mark</u>	<u>International Class(es)</u>	<u>Date of First Use</u>
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2,443,393

041

04/30/2000



1,861,767

016, 025

09/00/1963



0,971,048

RAMS

041

00/00/1937

Registrations numbers 0,971,047, 0,971,048, and 1,861,767 are incontestable pursuant to Section 15 of the Lanham Act, 15 U.S.C. § 1065. Copies of the certificates for these federal trademark registrations are attached hereto as Exhibit 7.

39. Plaintiff St. Louis Rams also is the owner of the following Washington State trademark registrations:



<u>Registration Number</u>	<u>Mark</u>	<u>International Class(es)</u>	<u>Date of First Use</u>
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032427

RAMS

014

00/1996

<u>Registration Number</u>	<u>Mark</u>	<u>International Class(es)</u>	<u>Date of First Use</u>
032428		014	00/2000
032429		014	00/1996

Copies of the certificates for these Washington State trademark registrations are attached hereto as **Exhibit 8**.

40. In addition to its aforementioned trademark registrations, the St. Louis Rams franchise owns common law rights in its RAMS Marks by virtue of their long and exclusive use.

41. Over more than seventy years, the Rams franchise has invested substantial resources in building public recognition in the RAMS Marks. As a result, the RAMS Marks are recognized by fans around the world as signifying an association with the St. Louis Rams football franchise and with Plaintiffs NFL and NFLP.

The Business Of NFL Properties

42. To fulfill its obligations to promote and financially exploit the NFL and Member Club trademarks, NFLP has entered into license agreements with manufacturers and distributors of merchandise and services by which such companies are licensed to use the SUPER BOWL

1 and/or Member Club marks in connection with authorized goods or as part of a sponsorship
 2 designation ("Licensees"). NFLP has entered into license agreements for use of the SUPER
 3 BOWL and Member Club marks with manufacturers and distributors of a wide variety of goods
 4 and services, including but not limited to, jewelry, novelty items, sporting goods, clothing and
 5 business services. Some of these Licensees include, but are not limited to, Jostens, Michael
 6 Anthony, and Anderson Jewelry. On behalf of the NFL, NFLP controls and monitors the quality
 7 and style of Licensees' products and services incorporating the SUPER BOWL and Member
 8 Club marks. Merchandise and services featuring the SUPER BOWL and Member Club marks
 9 are advertised through a wide variety of media, including over the Internet and in various printed,
 10 direct-mail catalogues.

11 43. Licensees have invested significant amounts of capital and have devoted
 12 substantial amounts of time and effort to the production, marketing and promotion of
 13 merchandise and services bearing the SUPER BOWL and Member Club marks and have
 14 established a significant consumer demand for these items through such efforts. Consumers
 15 readily identify SUPER BOWL and Member Club merchandise and services as being sponsored
 16 and approved by the NFL.

17 44. Licensees manufacture and distribute merchandise and services in connection
 18 with the SUPER BOWL and Member Club marks throughout the United States in interstate
 19 commerce.

20 45. NFLP derives income in the form of payments from Licensees to use the SUPER
 21 BOWL and Member Club marks.

22 **Defendants' Unlawful Activities**

23 46. Upon information and belief, Daniel W. Base and Stacy Base are individuals, and
 24 a married couple, residing in Bothell, Washington. Upon information and belief, the Bases do
 25 business under the names All Sports Enterprises and All Star Sports Collectibles.

26 47. Defendants have offered, and upon information and belief continue to offer for
 27 sale, counterfeit rings that feature the Plaintiffs' SUPER BOWL, VINCE LOMBARDI SUPER

1 BOWL TROPHY, PATRIOTS, RAIDERS and RAMS trademarks.

2 48. Defendants have sold and offered for sale this counterfeit and infringing
3 *merchandise through eBay auctions. A representative listing for a counterfeit PATRIOTS ring*
4 *offered by the Defendants is annexed hereto as Exhibit 9. A representative listing for a*
5 *counterfeit RAIDERS ring offered by the Defendants is annexed hereto as Exhibit 10.*

6 49. Defendants also have offered and, upon information and belief, sold, counterfeit
7 rings bearing the SUPER BOWL and NFL Member Club trademarks through direct mail
8 solicitations. Annexed hereto as Exhibit 11 is a post card offering a St. Louis Rams SUPER
9 BOWL XXXIV Ring that was mailed by the Defendants.

10 **Plaintiffs' Prior Enforcement Efforts**

11 50. Plaintiffs first learned of Defendants' unlawful activities in late 2003. On
12 November 13, 2003, Plaintiffs contacted eBay and requested that the auctions for Defendants'
13 counterfeit and infringing merchandise be halted and removed from eBay's listings. See
14 Exhibit 12. In December 2003 and in February 2004, Plaintiffs learned of additional infringing
15 items being offered for sale by Defendants on eBay, and again contacted eBay asking that the
16 counterfeit items be removed from eBay's listings and the auctions be halted. See Exhibit 13.

17 51. On February 20, 2004, Plaintiff NFL sent a cease and desist letter to Defendants
18 demanding that they cease their infringing activities. The same day, Defendant Daniel Base
19 responded to NFL via e-mail, saying that Defendants had "ceased all marketing for the
20 championship rings." See Exhibit 14.

21 52. On February 23, 2004, Plaintiff Patriots ordered and paid for a counterfeit New
22 England Patriots Silver Championship ring on eBay from the user "mauiprincess!". Upon
23 information and belief, "mauiprincess!" is the eBay user ID for Defendant Stacy Base. The
24 "mauiprincess!" eBay user ID is linked to the e-mail address (basestacy@aol.com) on eBay.com.
25 See Exhibit 15.

26 53. Later in February 2004, NFL again contacted the Defendants, reiterating the
27 demand that Defendants cease their infringing activities. Defendants did not respond, and

1 continued to list infringing and counterfeit items in eBay auctions.

2 54. In May 2004, Plaintiff Patriots received the counterfeit New England Patriots
3 Silver Championship Ring they had ordered. Photographs of that ring, which bears Plaintiffs'
4 SUPER BOWL and PATRIOTS trademarks, are annexed hereto as **Exhibit 16**.

5 55. On March 3, 2004, an agent for Plaintiff NFL ordered and paid for a second
6 counterfeit ring from the Defendants, specifically a Raiders Super Bowl Championship Ring. As
7 with the Patriots ring, the counterfeit Raiders ring was ordered on eBay from the user
8 "mauprincess!". After the Plaintiff's agent inquired about the ring, "Basestacy" emailed
9 payment instructions, directing that payment for the ring be made by money order to Stacy Base,
10 P.O. Box 12517, Mill Creek, WA, 98082.

11 56. On June 25, 2004, Plaintiff NFL's agent received the counterfeit Los Angeles
12 Raiders Super Bowl Championship Ring they had ordered. Photographs of that ring, which
13 bears Plaintiffs' SUPER BOWL and RAIDERS trademarks, are annexed hereto as **Exhibit 17**.

14 57. Also in June 2004, Plaintiff St. Louis Rams received the postcard annexed hereto
15 as **Exhibit 11**, offering a counterfeit ring bearing the SUPER BOWL and RAMS trademarks.

16 58. On July 1, 2004, the St. Louis Rams football franchise sent a cease and desist
17 letter to Defendants demanding that they cease any and all use of the NFL and RAMS marks. A
18 copy of the Rams' July 1, 2004 cease and desist letter to the Defendants is annexed hereto as
19 **Exhibit 18**.

20
21 **CLAIM I**
22 **COUNTERFEITING (15 U.S.C. §§ 1114, 1116(D) AND 1117(B) AND (C))**

23 59. Plaintiffs reallege and incorporate by reference the allegations contained in
24 paragraphs 1 through 58 as if fully set forth herein.

25 60. The Defendants' offering for sale and sale of unauthorized merchandise that bears
26 the Plaintiffs' trademarks constitutes counterfeiting in violation of §§ 32, 34(d), and 35(b) and
27 (c) of the Lanham Act, 15 U.S.C. §§ 1114, 1116(d) and 1117(b) and (c).

62. The Defendants have engaged in and continue to engage in these activities knowingly, willfully and deliberately, so as to justify the assessment of exemplary damages against them, in an amount to be determined at the time of trial.

63. In the alternative, Defendants' knowing, willful and deliberate conduct justifies the award of statutory damages against them, in the maximum amount provided by statute.

64. The Defendants' acts of counterfeiting, unless enjoined by this Court, will continue to cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs have no adequate remedy at law.

CLAIM II
FEDERAL TRADEMARK INFRINGEMENT (15 U.S.C. § 1114)

CLAIM II
FEDERAL TRADEMARK INFRINGEMENT (15 U.S.C. § 1114)

65. Plaintiffs reallege and incorporate by reference the allegations contained in paragraphs 1 through 64 as if fully set forth herein.

66. The Defendants' activities constitute trademark infringement in violation of § 32 of the Lanham Act, 15 U.S.C. § 1114, because Defendants' use of counterfeit and/or confusingly similar designations is likely to cause confusion, or to cause mistake, or to deceive consumers into believing that Defendants' products originate from, are affiliated with, or are sponsored, authorized, approved or sanctioned by Plaintiffs.

67. The Defendants' acts of trademark infringement have caused Plaintiffs to sustain monetary damage, loss and injury, in an amount to be determined at the time of trial.

68. The Defendants have engaged in and continue to engage in these activities knowingly, willfully and deliberately, so as to justify the assessment of exemplary damages against them, in an amount to be determined at the time of trial.

69. The Defendants' acts of trademark infringement, unless enjoined by this Court, will continue to cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs have no adequate remedy at law.

CLAIM III
FALSE DESIGNATION OF ORIGIN AND FALSE REPRESENTATION
(15 U.S.C. § 1125(a))

70. Plaintiffs reallege and incorporate by reference the allegations contained in paragraphs 1 through 69 as if fully set forth herein.

71. The Defendants' activities constitute false designation of origin, false descriptions and representations and false advertising in commerce in violation of § 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), because they are likely to mislead the trade and public into believing that Defendants' products originate from, are affiliated with, or are sponsored, authorized, approved or sanctioned by Plaintiffs.

72. The Defendants' acts of false designation of origin, false representation and false advertising have caused Plaintiffs to sustain monetary damage, loss and injury, in an amount to be determined at the time of trial.

73. The Defendants have engaged in and continue to engage in these activities knowingly, willfully and deliberately, so as to justify the assessment of exemplary damages against them, in an amount to be determined at the time of trial.

74. The Defendants' acts of false designation of origin, false representation and false advertising, unless enjoined by this Court, will continue to cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs have no adequate remedy at law.

CLAIM IV
FEDERAL TRADEMARK DILUTION
(15 U.S.C. § 1125(c))

75. Plaintiffs reallege and incorporate by reference the allegations contained in paragraphs 1 through 74 as if fully set forth herein.

76. The NFL trademarks, including the SUPER BOWL, PATRIOTS, RAIDERS and RAMS text and logo marks and the Vince Lombardi Super Bowl Trophy trademark, are some of the most famous trademarks used in interstate commerce in the United States. Among other things, (a) these trademarks are inherently distinctive and have a high degree of acquired distinctiveness; (b) Plaintiffs have used these trademarks for many years throughout the United

1 States and worldwide in connection with numerous products and services; (c) Plaintiffs have
 2 advertised and publicized these trademarks for a considerable amount of time throughout the
 3 United States and worldwide; (d) Plaintiffs have used these trademarks in a trading area of broad
 4 geographical scope encompassing, inter alia, all of the states and territories of the United States;
 5 (e) these trademarks have an extremely high degree of recognition among consumers; (f) there
 6 are no similar trademarks lawfully in use to any extent or in any nature by third parties in
 7 connection with such a broad range of products and services; (g) many of these trademarks,
 8 including the SUPER BOWL, NEW ENGLAND PATRIOTS, the PATRIOTS Logo Design,
 9 OAKLAND RAIDERS, the RAIDERS Logo Design, ST. LOUIS RAMS, the RAMS Logo
 10 Design, and the Vince Lombardi Super Bowl Trophy word marks and logo designations, are
 11 registered under the Lanham Act on the Principal Register.

12 77. The Defendants' activities constitute trademark dilution in violation of § 43(a) of
 13 the Lanham Act, 15 U.S.C. § 1125(a), because they are likely to, and do, dilute and diminish the
 14 distinctive value of Plaintiffs' famous trademarks.

15 78. The Defendants' acts of trademark dilution have caused Plaintiffs to sustain
 16 monetary damage, loss and injury, in an amount to be determined at the time of trial.

17 79. The Defendants have engaged in and continue to engage in these activities
 18 knowingly, willfully and deliberately, so as to justify the assessment of exemplary damages
 19 against them, in an amount to be determined at the time of trial.

20 80. The Defendants' acts of trademark dilution, unless enjoined by this Court, will
 21 continue to cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs
 22 have no adequate remedy at law.

23 **CLAIM V**
 24 **WASHINGTON STATE TRADEMARK IMITATION**
 25 **(RCW 19.77.140 et seq.)**

26 81. Plaintiffs reallege and incorporate by reference the allegations contained in
 27 paragraphs 1 through 80 as if fully set forth herein.

82. Plaintiffs NFL, New England Patriots, Oakland Raiders and St. Louis Rams are

1 the respective owners of Washington State trademark registrations for the trademarks SUPER
2 BOWL, PATRIOTS, PATRIOTS Logo Design, RAIDERS, RAIDERS Logo Design, RAMS and
3 RAMS Logo Design for use in connection with jewelry in International Class 014.

4 83. The Defendants' activities as described above were without Plaintiffs' permission,
5 and have caused and are likely to continue to cause confusion, mistake or deception between the
6 Defendants and/or their products and Plaintiffs and/or their products and services. Such
7 unlawful activities infringe the valuable trademark and other rights of Plaintiffs in their SUPER
8 BOWL, VINCE LOMBARDI SUPER BOWL TROPHY, PATRIOTS, RAIDERS and RAMS
9 trademarks. The Defendants' actions, as alleged herein, misrepresent the nature, characteristics
10 or qualities of their services or commercial activities.

11 84. The acts and conduct of the Defendants, as alleged herein, constitute infringement
12 of Plaintiffs' SUPER BOWL, VINCE LOMBARDI SUPER BOWL TROPHY, PATRIOTS,
13 RAIDERS and RAMS trademarks registered in Washington State, and an effort to
14 misappropriate Plaintiffs' trademarks.

15 85. The Defendants' aforesaid acts have caused Plaintiffs to sustain monetary
16 damage, loss and injury, in an amount to be determined at the time of trial.

17 86. The Defendants have engaged and continue to engage in these activities
18 knowingly, willfully and deliberately, so as to justify the assessment against them of Plaintiffs'
19 costs and attorneys' fees incurred in this proceeding.

20 87. The Defendants' aforesaid acts, unless enjoined by this Court, will continue to
21 cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs have no
22 adequate remedy at law.

23 **CLAIM VI**
24 **WASHINGTON STATE TRADEMARK DILUTION - INJUNCTIVE RELIEF FOR**
25 **OWNERS OF FAMOUS MARKS**
26 **(RCW 19.77.160 *et seq.*)**

27 88. Plaintiffs reallege and incorporate by reference the allegations contained in
paragraphs 1 through 87 as if fully set forth herein.

1 89. Plaintiffs' SUPER BOWL, VINCE LOMBARDI SUPER BOWL TROPHY,
2 PATRIOTS, RAIDERS and RAMS trademarks are distinctive and famous, and became famous,
3 including in the State of Washington, prior to Defendants' unlawful activities.

4 90. The Defendants' activities are likely to, and do, dilute and diminish the distinctive
5 value of Plaintiffs' famous trademarks.

6 91. The Defendants' acts of trademark dilution have caused Plaintiffs to sustain
7 monetary damage, loss and injury, in an amount to be determined at the time of trial.

8 92. The Defendants have engaged and continue to engage in these activities
9 knowingly, willfully and deliberately, so as to justify the assessment against them of Plaintiffs'
10 costs and attorneys' fees incurred in this proceeding.

11 93. The Defendants' acts of trademark dilution, unless enjoined by this Court, will
12 continue to cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs
13 have no adequate remedy at law.

14
15 **CLAIM VII**
16 **COMMON LAW TRADEMARK INFRINGEMENT**

17 94. Plaintiffs reallege and incorporate by reference the allegations contained in
18 paragraphs 1 through 93 as if fully set forth herein.

19 95. Plaintiffs own the SUPER BOWL, VINCE LOMBARDI SUPER BOWL
20 TROPHY, PATRIOTS, RAIDERS and RAMS trademarks. Plaintiffs have used these marks
21 continuously for several decades and their use is prior to that of the Defendants' use of these
22 marks in connection with jewelry items.

23 96. The Defendants' activities have caused and are likely to continue to cause
24 confusion between the Defendants and/or their products and Plaintiffs and/or their officially
25 licensed products, and such unlawful activities infringe the valuable common law trademark and
26 other rights of Plaintiffs in their aforementioned marks. The Defendants' actions, as alleged
27 herein, misrepresent the nature, characteristics or qualities of their services or commercial

1 activities.

2 97. The acts and conduct of the Defendants, as alleged herein, constitute infringement
3 of Plaintiffs common law rights in their trademarks, and an effort to misappropriate Plaintiffs'
4 trademarks.

5 98. The Defendants' aforesaid acts have caused Plaintiffs to sustain monetary
6 damage, loss and injury, in an amount to be determined at the time of trial.

7 99. The Defendants have engaged and continue to engage in these activities
8 knowingly, willfully and deliberately, so as to justify the assessment of exemplary damages
9 against them, in an amount to be determined at the time of trial.

10 100. The Defendants' aforesaid acts, unless enjoined by this Court, will continue to
11 cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs have no
12 adequate remedy at law.

13 **CLAIM VIII**
14 **UNFAIR COMPETITION AND MISAPPROPRIATION (COMMON LAW)**

15 101. Plaintiffs reallege and incorporate by reference the allegations contained in
16 paragraphs 1 through 100 as if fully set forth herein.

17 102. The Defendants' aforesaid activities, including their continued use of the SUPER
18 BOWL, VINCE LOMBARDI SUPER BOWL TROPHY, PATRIOTS, RAIDERS and RAMS
19 text and logo design marks constitute unfair competition with Plaintiffs by creating a likelihood
20 of confusion as to the source or sponsorship of the products sold by the Defendants;
21 misappropriate the Plaintiffs' unique reputation and goodwill that is embodied in the Plaintiffs'
22 trademarks, thereby injuring that reputation and goodwill; and divert from Plaintiffs the benefits
23 arising therefrom.

24 103. The Defendants' aforesaid acts have caused Plaintiffs to sustain monetary
25 damage, loss and injury, in an amount to be determined at the time of trial.

26 104. The Defendants have engaged and continue to engage in these activities
27 knowingly, willfully and deliberately, so as to justify the assessment of exemplary damages

1 against them, in an amount to be determined at the time of trial.

2 105. The Defendants' aforesaid acts, unless enjoined by this Court, will continue to
3 cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs have no
4 adequate remedy at law.

5 **CLAIM IX**
6 **VIOLATION OF WASHINGTON STATE CONSUMER PROTECTION ACT**
7 **(RCW 19.86.020)**

8 106. Plaintiffs reallege and incorporate by reference the allegations contained in
9 paragraphs 1 through 105 as if fully set forth herein.

10 107. The state of Washington has an important interest in ensuring that domestic
11 corporations doing business with Washington residents fully comply with Washington laws.

12 108. The Defendants' conduct complained of herein is an unfair act or practice that has
13 the capacity to and does deceive consumers into believing that they are receiving products from
14 Plaintiffs or Plaintiffs' official licensees when this is not the case.

15 109. The Defendants' conduct occurred in the conduct of trade or commerce or the sale
16 of services.

17 110. The products offered by Plaintiffs and the Defendants implicate the public
18 interest.

19 111. All the conduct alleged herein occurs and continues to occur in the course of the
20 Defendants' business. The conduct is part of a pattern or generalized course of conduct repeated
21 on numerous occasions daily.

22 112. The Defendants have engaged and continue to engage in these activities
23 knowingly, willfully and deliberately.

24 113. Plaintiffs have been directly and proximately injured in their business and
25 property by the Defendants' conduct complained of herein, in violation of Plaintiffs' rights under
26 RCW 19.86.020.

27 114. The Defendants' violations of RCW 19.86.020 have caused Plaintiffs to sustain
monetary damage, loss and injury, in an amount to be determined at the time of trial.

115. In addition, pursuant to RCW 19.86.090, Plaintiffs are entitled to trebled damages, attorneys' fees and costs of suit, all in amounts to be determined at trial.

116. The Defendants' violations of RCW 19.86.020, unless enjoined by this Court, will continue to cause Plaintiffs to sustain irreparable damage, loss and injury, for which Plaintiffs have no adequate remedy at law.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request entry of a judgment and Order in their favor and against Defendants on all claims as follows:

A. For a permanent injunction against the Defendants and each of their officers, agents, servants, employees and attorneys, and those persons acting in concert or participation with them who receive actual notice of the Order by personal service or otherwise:

1. Using on or in connection with the production, manufacture, advertising, promotion, displaying for sale, offering for sale, sales or distribution of any products or services, or for any commercial purposes whatsoever the words SUPER BOWL, NEW ENGLAND PATRIOTS, PATRIOTS, the PATRIOTS Logo Design, OAKLAND RAIDERS, RAIDERS, the RAIDERS Logo Design, ST. LOUIS RAMS, RAMS, the RAMS Logo Design and the Vince Lombardi Super Bowl Trophy, or any colorable imitations thereof or anything confusingly similar thereto or any of Plaintiffs' trademarks;

2. Representing by any means whatsoever, directly or indirectly, or doing any other acts or things calculated or likely to cause confusion, mistake or to deceive consumers into believing that the Defendants' services or products are the services or products of Plaintiffs, or that there is any affiliation or connection between Plaintiffs or their services and goods and Defendants or its services and products and from otherwise unfairly competing with Plaintiffs;

3. Using any mark in a manner so as to dilute the distinctive quality of the famous SUPER BOWL, NEW ENGLAND PATRIOTS, PATRIOTS, PATRIOTS Logo Design,

1 OAKLAND RAIDERS, RAIDERS, RAIDERS Logo Design, ST. LOUIS RAMS, RAMS,
2 RAMS Logo Design or Vince Lombardi Super Bowl Trophy trademarks.

3 B. That Defendants be required to recall from any and all channels of trade any and
4 all advertising or promotional materials or other infringing matter and to take affirmative steps to
5 dispel any false suggestion of a connection to Plaintiffs by virtue of Defendants' infringing
6 activities, including, but not limited to, all necessary and appropriate corrective advertising
7 measures.

8 C. Restraining the Defendants from inducing, encouraging, instigating, aiding,
9 abetting or contributing to any of the aforesaid acts.

10 D. That all materials, packaging, labels, tags, pamphlets, brochures, signs, sales
11 literature, stationery, advertisements, contracts, documents, materials and the like in the
12 possession or under the control of the Defendants, and all plates, molds, matrices, negatives,
13 masters and other means of making the same, which might, if used, violate such Order, be
14 delivered up and destroyed as the Court shall direct.

15 E. That the Defendants be directed to cancel pending orders from customers who
16 purchased or offered to purchase counterfeit merchandise from Defendants and be required to
17 notify all such potential purchasers that such orders should be directed to Plaintiff NFLP.

18 F. That the Defendants be directed to provide to Plaintiffs a listing of each and every
19 sale of counterfeit merchandise by Defendants including, for each, an identification of the
20 transaction date and subject merchandise, the customer name and address, and the price paid.

21 G. That the Defendants file with the Court and serve on counsel for Plaintiffs within
22 thirty (30) days after service on the Defendants of such Order, or within such extended period as
23 this Court may direct, a report in writing and under oath, setting forth in detail the manner and
24 form in which the Defendants have complied with the Order and injunction.

25 H. For an award against the Defendants, jointly, severally, and personally, of the
26 Defendants' profits and Plaintiffs' damages resulting from the Defendants' unlawful acts set
27 forth herein, in an amount to be proven at the time of trial, together with legal interest from the

1 date of accrual thereof.

2 I. For an award of treble damages pursuant to 15 U.S.C. § 1117 and/or enhanced
3 damages pursuant to RCW § 19.86.020.

4 J. For an award of statutory damages of \$1,000,000 per counterfeit mark per type of
5 goods sold by the Defendants, or such other amount as the Court considers just, pursuant to
6 15 U.S.C. § 1117(c).

7 K. For an award of exemplary damages pursuant to 15 U.S.C. § 1117.

8 L. That Plaintiffs be awarded the costs of this civil action, together with Plaintiffs'
9 attorney fees, pursuant to 15 U.S.C. § 1117, RCW 19.77.150, RCW 19.86.080, and the equity
10 powers of the Court.

11 M. That Defendants be ordered to pay Plaintiffs prejudgment interest on all sums
12 allowed by law.

13 N. That Plaintiffs be awarded such other and further relief as the Court may deem
14 equitable and proper.

15 **JURY DEMAND**

16 Plaintiffs request a jury trial on all issues so triable.

17 DATED this 12th day of August, 2004.

18 STOKES LAWRENCE, P.S.

19
20 By: 

Shannon M. Jost (WSBA # 32511)

21
22 Attorneys for Plaintiffs
23
24
25
26
27



04-CV-01776-EXH TO Complaint
1-9

Int. Cl.: 28

Prior U.S. Cl.: 22

United States Patent and Trademark Office
Renewal

Reg. No. 846,056
Registered Mar. 12, 1968
OG Date May 9, 1989

**TRADEMARK
SUPPLEMENTAL REGISTER**

SUPER BOWL

NATIONAL FOOTBALL LEAGUE (NEW
YORK UNINC. ASSOCIATION)
410 PARK AVE.
NEW YORK, NY 10022, ASSIGNEE BY
MESNE ASSIGNMENT AND CHANGE
OF NAME FROM TUDOR METAL
PRODUCTS CORPORATION (NEW
YORK CORPORATION) BROOKLYN,
NY

FOR: EQUIPMENT (OR APPARATUS)
SOLD AS A UNIT FOR PLAYING A
FOOTBALL-TYPE BOARD GAME, IN
CLASS 22 (INT. CL. 28).

FIRST USE 12-6-1966; IN COMMERCE
12-6-1966.

SER. NO. 261,119, FILED P.R.
12-19-1966; AM. S.R. 12-20-1967.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on May 9, 1989.*

Prior U.S. Cl.: 107

United States Patent and Trademark Office
10 Year Renewal

Reg. No. 882,283

Registered Dec. 9, 1969

Renewal Approved Nov. 27, 1989

**SERVICE MARK
PRINCIPAL REGISTER**

SUPER BOWL

NATIONAL FOOTBALL LEAGUE (NEW
YORK UNINC. ASSOCIATION)
410 PARK AVENUE
NEW YORK, NY 10022, ASSIGNEE OF
NATIONAL FOOTBALL LEAGUE
AND AMERICAN FOOTBALL
LEAGUE (NEW YORK CITIZEN) NEW
YORK, NY

FOR: ENTERTAINMENT SERVICES
IN THE NATURE OF FOOTBALL EXHI-
BITIONS, IN CLASS 107 (INT. CL. 41).

FIRST USE 1-15-1967; IN COMMERCE
1-15-1967.

SER. NO. 72-321,005, FILED 3-7-1969.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on Jan. 9, 1990.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Int. Cl.: 41

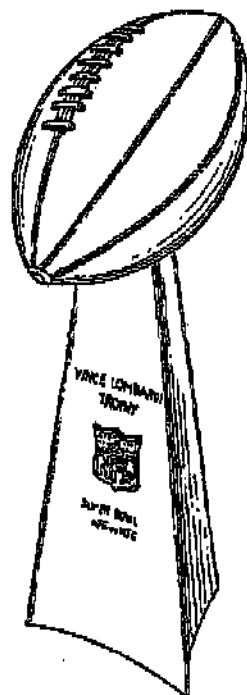
Prior U.S. Cl.: 107

United States Patent and Trademark Office

Reg. No. 1,226,261

Registered Feb. 1, 1983

SERVICE MARK
Principal Register



National Football League (New York association)
410 Park Ave.
New York, N.Y. 10022

For: PROMOTING INTEREST, EXCELLENCE AND SPORTSMANSHIP IN PROFESSIONAL FOOTBALL THROUGH THE MEDIUM OF AN ANNUAL AWARD, in CLASS 41 (U.S. Cl. 107).

First use May 7, 1974; in commerce May 7, 1974.
Owner of U.S. Reg. Nos. 882,055, 1,092,963 and

others.

No claim is made to the exclusive right to use "Trophy" and "Bowl", apart from the mark as shown.

The lining in the drawing is for shading purposes.

"Vince Lombardi" identifies a famous football coach who is now deceased.

Sec. 2(f) as to trophy design only.

Ser. No. 356,536, filed Mar. 25, 1982.

JAMES GROSSMAN, Examining Attorney

UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, Sam Reed, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

certificate that according to records on file in this office,

trademark:

SUPER BOWL

registered in the State of Washington to

NATIONAL FOOTBALL LEAGUE

names of partners: (if any) ,

state of incorporation: (if any) New York and I further certify that such trademark
with file # 032384 was issued on July 12, 2004 and will expire on July 4, 2009.

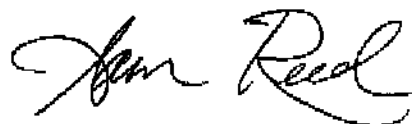
I further certify that the classification number of the trademark is 14 and the
actual goods or services with which the trademark is used are

jewelry

The date the trademark was first used anywhere is 1967 and the date the
trademark was first used in Washington is 1967.

Date: July 12, 2004

Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital



Sam Reed, Secretary of State



United States Patent Office

948,574
Registered Dec. 12, 1972

PRINCIPAL REGISTER Trademark

Ser. No. 400,609, filed Aug. 19, 1971

PATRIOTS

New England Patriots Football Club, Inc. (Massachusetts
corporation)
78 Lansdowne St.
Boston, Mass. 02215

For: PUBLICATIONS—NAMELY, FOOTBALL
PROGRAMS—in CLASS 38 (INT. CL. 16).
First use July 13, 1960; in commerce July 13, 1960.

The United States of America



Nº 948574

CERTIFICATE OF RENEWAL

This is to certify that the records of the Patent and Trademark Office show that an application was filed in said Office for renewal of registration of the Mark shown herein, a copy of said Mark and pertinent data from the Registration being annexed hereto and made a part hereof,

And there having been due compliance with the requirements of the law and with the regulations prescribed by the Commissioner of Patents and Trademarks,

Upon examination, it appeared that the applicant was entitled to have said Registration renewed under the Trademark Act of 1946, as amended, and said Registration has been duly renewed in the Patent and Trademark Office to the registrant named herein.

This Registration shall remain in force for TEN years from the date that said Registration was due to expire unless sooner terminated as provided by law.



In Testimony Whereof I have hereunto set my hand and caused the seal of the Patent and Trademark Office to be affixed this sixteenth day of March 1993.

Robert M. Anderson

United States Patent Office

949,536

Registered Dec. 26, 1972

PRINCIPAL REGISTER Service Mark

Ser. No. 400,611, filed Aug. 19, 1971

PATRIOTS

New England Patriots Football Club, Inc. (Massachusetts
corporation)
78 Lansdowne St.
Boston, Mass. 02215

For: ENTERTAINMENT SERVICES—NAMESLY,
FOOTBALL EXHIBITIONS—in CLASS 107 (INT.
CL. 41).

First use Feb. 5, 1960; in commerce Feb. 5, 1960.

The United States of America



Nº 949536

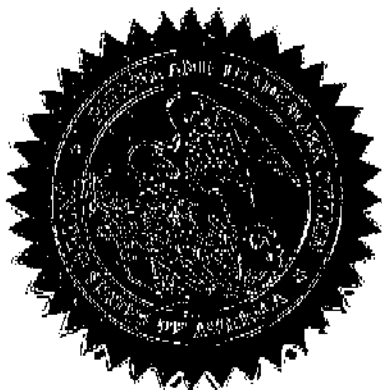
CERTIFICATE OF RENEWAL

This is to certify that the records of the Patent and Trademark Office show that an application was filed in said Office for renewal of registration of the Mark shown herein, a copy of said Mark and pertinent data from the Registration being annexed hereto and made a part hereof,

And there having been due compliance with the requirements of the law and with the regulations prescribed by the Commissioner of Patents and Trademarks,

Upon examination, it appeared that the applicant was entitled to have said Registration renewed under the Trademark Act of 1946, as amended, and said Registration has been duly renewed in the Patent and Trademark Office to the registrant named herein.

This Registration shall remain in force for TEN years from the date that said Registration was due to expire unless sooner terminated as provided by law.



In Testimony Whereof I have hereunto set my hand and caused the seal of the Patent and Trademark Office to be affixed this sixteenth day of March 1993.

Robert M. Anderson

Int. Cl.: 41

Prior U.S. Cl.: 107

United States Patent and Trademark Office

10 Year Renewal

Reg. No. 995,095

Registered Oct. 8, 1974

Renewal Term Begins Oct. 8, 1994

**SERVICE MARK
PRINCIPAL REGISTER**

NEW ENGLAND PATRIOTS

NEW ENGLAND PATRIOTS L.P. (MAS-
SACHUSETTS LIMITED PARTNER-
SHIP)

FOXBORO STADIUM, ROUTE 1

FOXBORO, MA 02035, BY ASSIGNMENT
AND CHANGE OF NAME FROM NEW
ENGLAND PATRIOTS FOOTBALL
CLUB, INC. (MASSACHUSETTS COR-
PORATION) FOXBORO, MA

OWNER OF U.S. REG. NOS. 948,574
AND 949,536.

FOR: ENTERTAINMENT SERVICES
IN THE FORM OF PROFESSIONAL
FOOTBALL GAMES AND EXHIBI-
TIONS, IN CLASS 41 (U.S. CL. 107).

FIRST USE 5-5-1971; IN COMMERCE
5-5-1971.

SER. NO. 73-002,188, FILED 9-27-1973.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on Nov. 29, 1994.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Int. Cls.: 16 and 25

Prior U.S. Cls.: 37, 38 and 39

Reg. No. 1,884,852

United States Patent and Trademark Office Registered Mar. 21, 1995

**TRADEMARK
PRINCIPAL REGISTER**

NEW ENGLAND PATRIOTS

NEW ENGLAND PATRIOTS L.P. (MASSACHU-
SETTS LIMITED PARTNERSHIP)
KRAFT PATRIOT INC.
ONE BOSTON PLACE
BOSTON, MA 02108 , BY CHANGE OF NAME
FROM KMS PATRIOTS L.P. (MASSACHU-
SETTS LIMITED PARTNERSHIP) FOXBORO,
MA 02035

FOR: TRADING CARDS, POSTERS, MAGA-
ZINES AND BOOKS REGARDING FOOTBALL,
POSTCARDS, CALENDARS, WRAPPING
PAPER, PAPER GIFT BOXES, PAPER STICK-
ERS, PAPER NAPKINS, PAPER TOWELS, POS-
TERBOOKS, NOTEPADS, PAPER PLATES,
PAPER CUPS, PAPER HATS AND GREETING
CARDS, IN CLASS 16 (U.S. CLS. 37 AND 38).

FIRST USE 9-0-1971; IN COMMERCE
9-0-1971.

FOR: MEN'S, WOMEN'S AND CHILDREN'S
CLOTHING AND FOOTWEAR; NAMELY,
COACHES CAPS, WOOL HATS, PAINTERS
CAPS, BASEBALL CAPS, VISORS, HEAD-

BANDS, EAR MUFFS, KNIT SKI MASKS,
BELTS, WRISTBANDS, T-SHIRTS, TANK TOPS,
PAJAMAS, GOLF SHIRTS, SWEATERS,
SWEATSHIRTS, JACKETS, NECKTIES,
BRACES, CLOTH BIBS, JERSEYS, NIGHT
SHIRTS, COATS, ROBES, RAINCOATS,
PARKAS, PONCHOS, SNEAKERS, GLOVES,
SCARVES, SNOW SUITS, MITTENS, APRONS,
DOWN JACKETS, LEATHER JACKETS,
SHORTS, SWEATPANTS, JEANS, PANTS,
KNICKERS, SOCKS, UNDERWEAR, BATHING
SUITS AND LEG WARMERS, IN CLASS 25
(U.S. CL. 39).

FIRST USE 5-0-1971; IN COMMERCE
5-0-1971.

OWNER OF U.S. REG. NOS. 948,574, 949,536,
AND 995,095.

SEC. 2(F).

SER. NO. 74-322,506, FILED 10-15-1992.

CHERYL LYNN BLACK, EXAMINING ATTOR-
NEY

Int. Cls.: 16 and 25

Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, 39, and 50

Reg. No. 2,035,889

United States Patent and Trademark Office

Registered Feb. 4, 1997

**TRADEMARK
PRINCIPAL REGISTER**



NEW ENGLAND PATRIOTS L.P. (MASSACHUSETTS LIMITED PARTNERSHIP)
KRAFT PATRIOT INC.
ONE BOSTON PLACE
BOSTON, MA 02108 BY CHANGE OF NAME
FROM KMS PATRIOTS L.P. (MASSACHUSETTS LIMITED PARTNERSHIP) FOXBORO, MA 02035

FOR: TRADING CARDS, POSTERS, MAGAZINES RELATING TO FOOTBALL, POSTCARDS, CALENDARS, WRAPPING PAPER, PAPER GIFT BOXES, PAPER STICKERS, PAPER NAPKINS, PAPER TOWELS, BOOKS RELATING TO FOOTBALL, POSTERBOOKS, NOTEPADS, AND GREETING CARDS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 5-0-1993; IN COMMERCE 5-0-1993.

FOR: MEN'S, WOMEN'S AND CHILDREN'S CLOTHING AND FOOTWEAR; NAMELY,

COACHES CAPS, WOOL HATS, PAINTERS CAPS, BASEBALL CAPS, VISORS, HEADBANDS, EAR MUFFS, KNIT FACE MASKS, BELTS, WRISTBANDS, T-SHIRTS, TANK TOPS, PAJAMAS, GOLF SHIRTS, SWEATERS, SWEATSHIRTS, JACKETS, NECKTIES, SUSPENDERS, BIBS, JERSEYS, NIGHT SHIRTS, COATS, ROBES, RAINCOATS, PARKAS, PONCHOS, SNEAKERS, GLOVES, SCARVES, SNOW SUITS, MITTENS, APRONS, DOWN JACKETS, LEATHER JACKETS, SHORTS, SWEATPANTS, JEANS, PANTS, KNICKERS, SOCKS, UNDERWEAR, BATHING SUITS AND LEG WARMERS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 4-0-1993; IN COMMERCE 4-0-1993.

OWNER OF U.S. REG. NOS. 948,574 AND 949,536.

SN 74-374,928. FILED 4-2-1993.

SOPHIA P. KIM, EXAMINING ATTORNEY

Int. Cls.: 16, 25 and 41

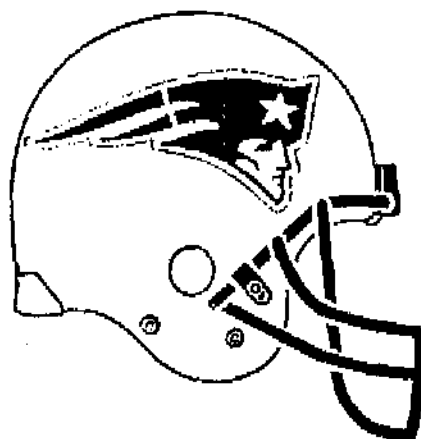
Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, 39, 50, 100,
101 and 107

Reg. No. 2,029,693

United States Patent and Trademark Office

Registered Jan. 14, 1997

**TRADEMARK
SERVICE MARK
PRINCIPAL REGISTER**



NEW ENGLAND PATRIOTS L.P. (DELAWARE
LIMITED PARTNERSHIP)
FOXBORO STADIUM, 60 WASHINGTON
STREET
FOXBORO, MA 02035

FOR: TRADING CARDS, POSTERS, MAGA-
ZINES RELATING TO FOOTBALL, POST-
CARDS, CALENDARS, WRAPPING PAPER,
PAPER GIFT BOXES, PAPER STICKERS,
PAPER NAPKINS, PAPER TOWELS, BOOKS
RELATING TO FOOTBALL, POSTERBOOKS,
NOTEPADS, PAPER PARTY HATS AND

GREETING CARDS, IN CLASS 16 (U.S. CLS. 2,
5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 5-0-1993; IN COMMERCE
5-0-1993.

FOR: MEN'S, WOMEN'S AND CHILDREN'S
CLOTHING AND FOOTWEAR, NAMELY
COACHES CAPS, WOOL HATS, PAINTERS
CAPS, BASEBALL CAPS, VISORS, HEAD-
BANDS, EAR MUFFS, KNIT FACE MASKS,
BELTS, WRISTBANDS, T-SHIRTS, TANK TOPS,
PAJAMAS, GOLF SHIRTS, SWEATERS,
SWEATSHIRTS, JACKETS, NECKTIES, SUS-
PENDERS, CLOTH BIBS, JERSEYS, NIGHT

Int. Cl.: 41

Prior U.S. Cls.: 100, 101 and 107

United States Patent and Trademark Office

Reg. No. 2,711,199

Registered Apr. 29, 2003

**SERVICE MARK
PRINCIPAL REGISTER**



NEW ENGLAND PATRIOTS L.P. (DELAWARE
LIMITED PARTNERSHIP)
CMGI FIELD
ONE PATRIOT PLACE
FOXBORO, MA 02035

FOR: EDUCATION AND ENTERTAINMENT
SERVICES IN THE NATURE OF ORGANIZING
AND PRESENTING PROFESSIONAL FOOTBALL
GAMES AND EXHIBITIONS; PROVIDING SPORTS
AND ENTERTAINMENT INFORMATION VIA A
GLOBAL COMPUTER NETWORK OR A COMMER-
CIAL ON-LINE SERVICE; ORGANIZATION OF
SPORTS EVENTS; FAN CLUB SERVICES; EDUCA-
TIONAL SERVICES, NAMELY, PHYSICAL EDUCA-
TION PROGRAMS AND SEMINARS IN THE FIELD
OF FOOTBALL; ENTERTAINMENT SERVICES,
NAMELY, MUSICAL AND DANCE PERFORMAN-
CES PROVIDED DURING INTERVALS AT SPORTS

EVENTS; PRODUCTION OF RADIO AND TELEV-
SION PROGRAMS, FOOTBALL GAMES, EXHIBI-
TIONS, COMPETITIONS AND MUSICAL, COMEDY
AND DANCE PERFORMANCES PERFORMED BE-
FORE LIVE AUDIENCES AND BROADCAST VIA
TELEVISION, CABLE TELEVISION, SATELLITE
TELEVISION AND RADIO BROADCAST; PRODUC-
ING AND DISTRIBUTING AUDIO VISUAL AND
MULTI-MEDIA PRESENTATIONS REGARDING
THE SPORT OF FOOTBALL VIA A GLOBAL COM-
MUNICATIONS NETWORK, IN CLASS 41 (U.S. CLS.
100, 101 AND 107).

FIRST USE 9-0-1993; IN COMMERCE 9-0-1993.

SER. NO. 76-419,866, FILED 6-12-2002.

KEVON CHISOLM, EXAMINING ATTORNEY

Int. Cls.: 9, 16, 25, 28 and 41

Prior U.S. Cls.: 2, 5, 21, 22, 23, 26, 29, 36, 37, 38, 39,
50, 100, 101 and 107

Reg. No. 2,755,546

Registered Aug. 26, 2003

United States Patent and Trademark Office

**TRADEMARK
SERVICE MARK
PRINCIPAL REGISTER**



NEW ENGLAND PATRIOTS L.P. (DELAWARE
LIMITED PARTNERSHIP)
CMGI FIELD
ONE PATRIOT PLACE
FOXBORO, MA 02035

FOR: FOOTBALL HELMETS, TELEPHONES,
CELL PHONE COVERS, CELL PHONE STRAPS,
MAGNETIC CODED CHARGE CARDS AND PRE-
PAID TELEPHONE CALLING CARDS, DECORA-
TIVE MAGNETS, COMPACT DISCS, TAPES, PRE-
RECORDED VIDEOTAPES AND DVD'S FEATUR-
ING THE SPORT OF FOOTBALL, COMPUTER
GAME SOFTWARE AND DISKS AND VIDEO
GAME CARTRIDGES, COMPUTER MOUSE PADS,
CAMERA CASES, SUNGLASSES, EYEGLASS
CASES, EYEGLASS CHAINS, LIGHT SWITCH COV-
ERS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 4-0-1993; IN COMMERCE 4-0-1993.

FOR: POSTERS, CALENDARS, TRADING
CARDS, SERIES OF BOOKS RELATING TO FOOT-
BALL, MAGAZINES RELATING TO FOOTBALL,
NEWSLETTERS RELATING TO FOOTBALL, STICK-
ERS, BUMPER STICKERS, CREDIT CARDS WITH-
OUT MAGNETIC CODING, NOTE PAPER, PAPER
PENNANTS AND GREETING CARDS; NON-MAG-
NETICALLY CODED PREPAID PHONE CARDS,
PENS AND PENCILS, PENCIL CASES, RUB ON
DECORATIVE TRANSFERS, PICTORIAL PRINTS,
PICTURE POSTCARDS, ART PICTURES, STATION-
ERY, ENVELOPES, STATIONERY-TYPE PORTFO-
LIOS, PHOTO ALBUMS, SCRAPBOOK ALBUMS,
RING BINDERS, CHECKBOOK COVERS, TISSUE
PAPER, WRAPPING PAPER, PLAYING CARDS,

PAPER TABLE CLOTHS, PAPER NAPKINS, PAPER
PARTY HATS, PAPER PARTY INVITATIONS, PA-
PER GIFT CARDS; PAPER GIFT BAGS, PAPER
GIFT BOXES, PAPER DECORATIONS, COLLECTI-
BLE CARDS; COLLECTIBLE CARD AND MEMOR-
ABILIA HOLDERS, SOUVENIR PROGRAMS FOR
SPORTS EVENTS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23,
29, 37, 38 AND 50).

FIRST USE 9-0-1993; IN COMMERCE 9-0-1993.

FOR: MEN'S, WOMEN'S AND CHILDREN'S
CLOTHING, NAMELY, FLEECE TOPS AND BOT-
TOMS, CAPS, HEADWEAR, T-SHIRTS, SWEAT-
SHIRTS, SHORTS, TANK TOPS, JEANS,
SWEATERS, PANTS, JACKETS, TURTLENECKS,
JUMPSUITS, GOLF SHIRTS, WOVEN SHIRTS, KNIT
SHIRTS, JERSEYS, WRISTBANDS, WARM UP
SUITS, SWIMWEAR, WIND RESISTANT JACKETS,
RAINCOATS, PARKAS, PONCHOS, GLOVES, TIES,
SUSPENDERS, CLOTH BIBS, SLEEPWEAR, NAME-
LY, ROBES, NIGHT SHIRTS AND PAJAMAS, MIT-
TENS, KNIT HATS AND CAPS, SCARVES, APRONS,
HEADBANDS, EAR MUFFS, UNDERWEAR; FOOT-
WEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 4-0-1993; IN COMMERCE 4-0-1993.

FOR: TOYS AND SPORTING GOODS, NAMELY,
PLUSH TOYS, STUFFED ANIMALS, PLAY FIG-
URES, GOLF BALLS, GOLF BAGS, GOLF CLUBS,
GOLF CLUB COVERS, BOWLING BALLS, BOWL-
ING BAGS, FOOTBALLS, TOY BANKS, HAND
HELD UNIT FOR PLAYING ELECTRONIC GAMES;
HAND HELD UNIT FOR PLAYING VIDEO GAMES;
BOARD GAMES RELATING TO FOOTBALL,

CHRISTMAS TREE ORNAMENTS, BALLOONS, JIGSAW PUZZLES, WINDSOCKS, KITES, TOY TRUCKS AND REPLICA MINIATURE FOOTBALL HELMETS, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 9-0-1993; IN COMMERCE 9-0-1993.

FOR: EDUCATION AND ENTERTAINMENT SERVICES IN THE NATURE OF ORGANIZING AND PRESENTING PROFESSIONAL FOOTBALL GAMES AND EXHIBITIONS; PROVIDING SPORTS AND ENTERTAINMENT INFORMATION VIA A GLOBAL COMPUTER NETWORK OR A COMMERCIAL ON-LINE SERVICE; ORGANIZATION OF SPORTS EVENTS; FAN CLUB SERVICES; EDUCATIONAL SERVICES, NAMELY, PHYSICAL EDUCATION PROGRAMS AND SEMINARS IN THE FIELD OF FOOTBALL; ENTERTAINMENT SERVICES, NAMELY, MUSICAL AND DANCE PERFORMAN-

CES PROVIDED DURING INTERVALS AT SPORTS EVENTS; PRODUCTION OF RADIO AND TELEVISION PROGRAMS, FOOTBALL GAMES, EXHIBITIONS, COMPETITIONS AND MUSICAL, COMEDY AND DANCE PERFORMANCES PERFORMED BEFORE LIVE AUDIENCES AND BROADCAST VIA TELEVISION, CABLE TELEVISION, SATELLITE TELEVISION AND RADIO BROADCAST; PRODUCING AND DISTRIBUTING AUDIO VISUAL AND MULTI-MEDIA PRESENTATIONS REGARDING THE SPORT OF FOOTBALL VIA A GLOBAL COMMUNICATIONS NETWORK, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 9-0-1993; IN COMMERCE 9-0-1993.

SER. NO. 76-419,865, FILED 6-12-2002.

KEVON CHISOLM, EXAMINING ATTORNEY

UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, **Sam Reed**, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

certificate that according to records on file in this office,

trademark:

PATRIOTS

registered in the State of Washington to

NEW ENGLAND PATRIOTS L.P.

names of partners: (if any) ,


state of incorporation: (if any) Delaware and I further certify that such trademark
with file # 032390 was issued on July 13, 2004 and will expire on July 13, 2009.

I further certify that the classification number of the trademark is 14 and the
actual goods or services with which the trademark is used are
jewelry .

The date the trademark was first used anywhere is 9/93 and the date the
trademark was first used in Washington is 9/93.

Date: July 15, 2004

Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital



Sam Reed, Secretary of State



UNITED STATES OF AMERICA

The State of Washington

Secretary of State



I, **Sam Reed**, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

certificate that according to records on file in this office,

trademark:

**PROFILE OF HEAD WEARING HELMET, HELMET CONSISTING OF STAR
CENTERED AT FRONT & TWO FLAGS EXTENDING BEHIND HELMET**

registered in the State of Washington to

NEW ENGLAND PATRIOTS L.P.

names of partners: (if any) ,

state of incorporation: (if any) **DELAWARE** and I further certify that such trademark

with file # 32391 was issued on August 4, 2004 and will expire on July 13, 2009.

I further certify that the classification number of the trademark is 14 and the

actual goods or services with which the trademark is used are

JEWELRY

The date the trademark was first used anywhere is 9/1993 and the date the

trademark was first used in Washington is 9/1993.

Date: August 4, 2004

Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital



Sam Reed, Secretary of State



Int. Cl.: 25

Prior U.S. Cl.: 39

United States Patent and Trademark Office

Reg. No. 1,919,846

Registered Sep. 19, 1995

**TRADEMARK
PRINCIPAL REGISTER**

OAKLAND RAIDERS

NATIONAL FOOTBALL LEAGUE PROPERTIES, INC. (CALIFORNIA CORPORATION)
410 PARK AVENUE
NEW YORK, NY 10022

FOR: KNIT TOPS, HATS, JACKETS AND
JERSEYS, IN CLASS 25 (U.S. CL. 39).
FIRST USE 9-0-1991; IN COMMERCE
9-0-1991.

NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "OAKLAND", APART FROM
THE MARK AS SHOWN.

SER. NO. 74-490,242, FILED 2-15-1994.

LESLEY LAMOTHE, EXAMINING ATTORNEY

Int. Cls.: 16 and 25

Prior U.S. Cls.: 2, 37, 38 and 39

United States Patent and Trademark Office

Reg. No. 1,771,383

Registered May 18, 1993

**TRADEMARK
PRINCIPAL REGISTER**



LOS ANGELES RAIDERS (PARTNERSHIP)
322 CENTER STREET
EL SEGUNDO, CA 90245

FOR: TRADING CARDS, POSTERS, MAGAZINES RELATING TO PROFESSIONAL FOOTBALL, POST CARDS, CALENDARS, WRAPPING PAPER, PAPER GIFT BOXES, PAPER STICKERS, PAPER NAPKINS, PAPER TOWELS, BOOKS RELATING TO PROFESSIONAL FOOTBALL, POSTER BOOKS, NOTEPADS, PAPER PARTY HATS, GREETING CARDS, IN CLASS 16 (U.S. CLS. 2, 37 AND 38).
FIRST USE 9-0-1970; IN COMMERCE 9-0-1970.

FOR: MEN'S, WOMEN'S AND CHILDREN'S CLOTHING AND FOOTWEAR; NAMELY, COACHES CAPS, WOOL HATS, PAINTERS CAPS, BASEBALL CAPS, VISORS, HEADBANDS, EAR MUFFS, KNIT FACE MASKS, BELTS, WRISTBANDS, T-SHIRTS, TANK TOPS,

PAJAMAS, GOLF SHIRTS, SWEATERS, SWEATSHIRTS, JACKETS, TURTLENECKS, WINDBREAKERS, KNIT TOPS, NECKTIES, BRACES, BIBS, JERSEYS, NIGHT SHIRTS, COATS, ROBES, RAINCOATS, PARKAS, PONCHIOS, SNEAKERS, GLOVES, SCARVES, SNOW SUITS, MITTENS, APRONS, DOWN JACKETS, LEATHER JACKETS, SHORTS, SWEATPANTS, JEANS, PANTS, KNICKERS, SOCKS, UNDERWEAR, BATHING SUITS, AND LEG WARMERS, IN CLASS 25 (U.S. CL. 39).

FIRST USE 2-0-1970; IN COMMERCE 2-0-1970.

OWNER OF U.S. REG. NOS. 731,310, 973,685 AND OTHERS.

SER. NO. 74-252,823, FILED 3-6-1992.

KATHLEEN COONEY, EXAMINING ATTORNEY

Int. Cl.: 41

Prior U.S. Cl.: 107

United States Patent and Trademark Office

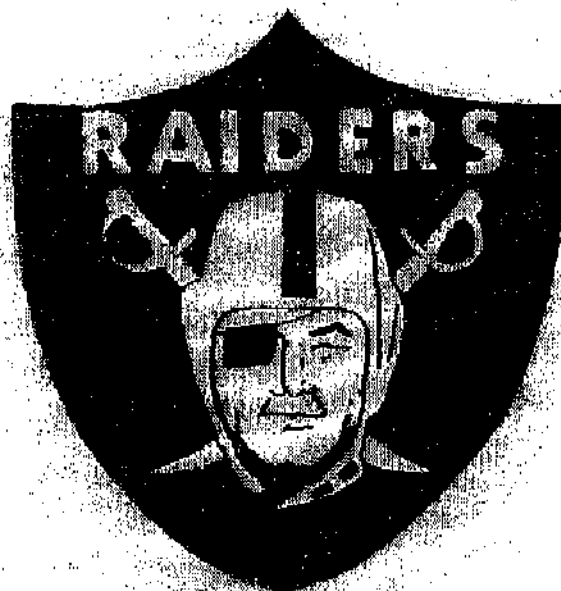
10 Year Renewal

Reg. No. 975,685

Registered Dec. 25, 1973

Renewal Term Begins Dec. 25, 1993

SERVICE MARK
PRINCIPAL REGISTER



LOS ANGELES RAIDERS, THE (CALIFORNIA LIMITED PARTNERSHIP)
332 CENTER STREET
EL SEGUNDO, CA 90245, BY CHANGE
OF NAME FROM OAKLAND RAIDERS (CALIFORNIA LIMITED PARTNERSHIP) OAKLAND, CA

OWNER OF U.S. REG. NOS. 731,309
AND 731,310

FOR ENTERTAINMENT SERVICES
IN THE FORM OF PROFESSIONAL
FOOTBALL GAMES AND EXHIBITIONS,
SOME OF WHICH ARE RENDERED
THROUGH THE MEDIUM OF
TELEVISION AND RADIO, IN CLASS
107 (INT. CL. 41).

FIRST USE 7-0-1960; IN COMMERCE
8-0-1960.

SER. NO. 72-436,589, FILED 9-25-1972.



Testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on Apr. 19, 1994.

Int. Cl.: 41

Prior U.S. Cl.: 107

United States Patent and Trademark Office

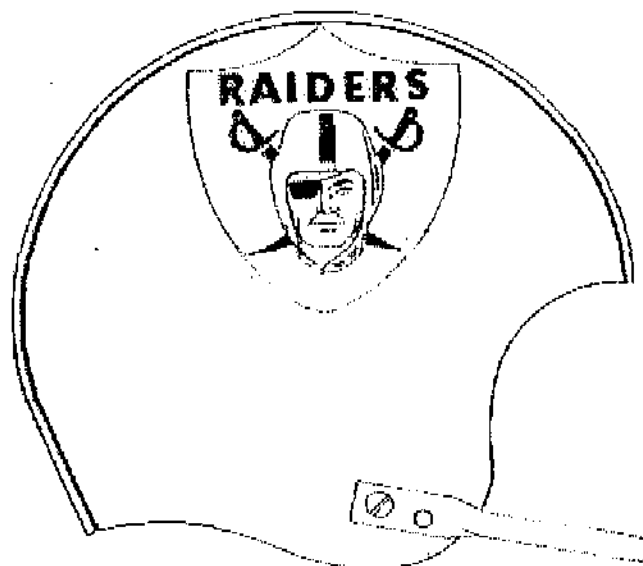
10 Year Renewal

Reg. No. 974,730

Registered Dec. 11, 1973

Renewal Term Begins Dec. 11, 1993

**SERVICE MARK
PRINCIPAL REGISTER**



LOS ANGELES RAIDERS, THE (CALIFORNIA LIMITED PARTNERSHIP)
332 CENTER STREET
EL SEGUNDO, CA 90245, BY CHANGE
OF NAME FROM OAKLAND RAIDERS (CALIFORNIA LIMITED PARTNERSHIP) OAKLAND, CA

OWNER OF U.S. REG. NOS. 731,309
AND 731,310.

THE REPRESENTATION OF THE FOOTBALL IS DISCLAIMED APART FROM THE MARK AS SHOWN.

FOR: PROFESSIONAL FOOTBALL GAMES AND EXHIBITIONS, SOME OF WHICH ARE RENDERED THROUGH THE MEDIUM OF TELEVISION AND RADIO, IN CLASS 107 (INT. CL. 41).

FIRST USE 7-0-1960; IN COMMERCE 8-0-1960.

SER. NO. 72-436,581, FILED 9-25-1972.



*many whereof I have hereunto set my hand
caused the seal of The Patent and Trademark
Office to be affixed on Feb. 22, 1994.*

United States Patent Office

731,309

Registered May 8, 1962

PRINCIPAL REGISTER

Service Mark

Ser. No. 109,506, Filed Dec. 2, 1960

RAIDERS

The Metropolitan Oakland Area Football Club, Inc.
(California corporation)
1432 Franklin St.
Oakland, Calif.

For: ENTERTAINMENT SERVICES IN THE NATURE OF FOOTBALL GAMES AND EXHIBITIONS, SOME OF WHICH ARE RENDERED THROUGH THE MEDIUM OF TELEVISION AND RADIO, in CLASS 107.

First use July 1960; in commerce August 1960.

UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, **Sam Reed**, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

certificate that according to records on file in this office,

trademark:

RAIDERS

registered in the State of Washington to

OAKLAND RAIDERS, LTD.

names of partners: (if any)

state of incorporation: (if any) California and I further certify that such trademark
with file # 032386 was issued on July 8, 2004 and will expire on July 8, 2009.

I further certify that the classification number of the trademark is 14 and the
actual goods or services with which the trademark is used are
jewelry

The date the trademark was first used anywhere is 9/1993 and the date the
trademark was first used in Washington is 9/1993.

Date: July 12, 2004

Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital



Sam Reed, Secretary of State

UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, Sam Reed, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

certificate that according to records on file in this office,
trademark:

**HEAD WEARING HELMET WITH CROSSED SWORDS BEHIND HEAD & TEXT
"RAIDERS" ABOVE HEAD, ALL ON SHIELD BACKGROUND**
registered in the State of Washington to

OAKLAND RAIDERS, LTD

names of partners: (if any)

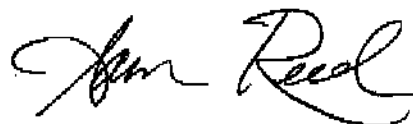
state of incorporation: (if any) CALIFORNIA and I further certify that such trademark
with file # 32385 was issued on August 4, 2004 and will expire on July 8, 2009.

I further certify that the classification number of the trademark is 14 and the
actual goods or services with which the trademark is used are
JEWELRY

The date the trademark was first used anywhere is 9/1993 and the date the
trademark was first used in Washington is 9/1993.

Date: August 4, 2004

Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital



Sam Reed, Secretary of State



Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 2,824,202

United States Patent and Trademark Office

Registered Mar. 23, 2004

**TRADEMARK
PRINCIPAL REGISTER**

ST. LOUIS RAMS

ST. LOUIS RAMS PARTNERSHIP (DELAWARE
GENERAL PARTNERSHIP)
4245 KINGSHIGHWAY BLVD.
ST. LOUIS, MO 63115, BY ASSIGNMENT LOS
ANGELES RAMS FOOTBALL COMPANY (DE-
LAWARE CORPORATION) ANAHEIM, CA 92801

FOR: CLOTHING, NAMELY T-SHIRTS, CAPS
AND SWEATSHIRTS, IN CLASS 25 (U.S. CLS. 22
AND 39).

FIRST USE 4-12-1995; IN COMMERCE 4-12-1995.

NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "ST. LOUIS", APART FROM THE
MARK AS SHOWN.

SER. NO. 74-666,081, FILED 4-26-1995.

JACQUELINE A. LAVINE, EXAMINING ATTOR-
NEY

Int. Cl.: 28

Prior U.S. Cls.: 22, 23, 38, and 50

United States Patent and Trademark Office

Reg. No. 2,808,932

Registered Jan. 27, 2004

**TRADEMARK
PRINCIPAL REGISTER**



ST. LOUIS RAMS PARTNERSHIP (PARTNER-
SHIP)
RAMS WAY
ST. LOUIS, MO 63045

FOR: TOYS AND SPORTING GOODS, NAMELY,
PLUSH TOYS, STUFFED TOY ANIMALS, PLAY
FIGURES, GOLF BALLS, GOLF BAGS, GOLF
CLUBS, GOLF CLUB COVERS, BOWLING BALLS,
BOWLING BAGS, FOOTBALLS, TOY BANKS,
HAND HELD UNIT FOR PLAYING ELECTRONIC
GAMES; HAND HELD UNIT FOR PLAYING VIDEO

GAMES; BOARD GAMES RELATING TO FOOT-
BALL, CHRISTMAS TREE ORNAMENTS, BAL-
LOONS, JIGSAW PUZZLES, AND TOY
WINDSOCKS, IN CLASS 28 (U.S. CLS. 22, 23, 38
AND 50).

FIRST USE 6-0-2000; IN COMMERCE 6-0-2000.

SN 75-861,598, FILED 12-1-1999.

M. E. BODSON, EXAMINING ATTORNEY

Int. Cl.: 16

Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, and 50

United States Patent and Trademark Office

Reg. No. 2,565,679

Registered Apr. 30, 2002

TRADEMARK
PRINCIPAL REGISTER



ST. LOUIS RAMS PARTNERSHIP (PARTNER-
SHIP)
1 RAMS WAY,
ST. LOUIS, MO 63045

FOR: POSTERS, CALENDARS, TRADING
CARDS, SERIES OF BOOKS RELATING TO FOOT-
BALL, MAGAZINES RELATING TO FOOTBALL,
NEWSLETTERS RELATING TO FOOTBALL, NOTE-
PADS, STICKERS, BUMPER STICKERS, PENS AND
PENCILS, CREDIT CARDS WITHOUT MAGNETIC
ENCODING, NOTE PADS, PAPER PENNANTS AND
GREETING CARDS, PRINTED TICKETS TO
SPORTS GAMES AND EVENTS, NON-MAGNETI-
CALLY CODED PREPAID PHONE CARDS, PENCIL
CASES, RUB ON DECORATIVE TRANSFERS, NOTE
PAPER, PICTORIAL PRINTS, PICTURE POST-
CARDS, ART PICTURES, STATIONERY, ENVEL-

OPES, STATIONERY-TYPE PORTFOLIOS, PHOTO
ALBUMS, SCRAPBOOK ALBUMS, RING BINDERS,
CHECKBOOK COVERS, TISSUE PAPER, WRAP-
PING PAPER, PLAYING CARDS, PAPER TABLE
CLOTHS, PAPER NAPKINS, PAPER PARTY HATS,
PAPER PARTY INVITATIONS, PAPER GIFT
CARDS, PAPER GIFT BAGS, PAPER GIFT BOXES,
COLLECTIBLE CARDS, COLLECTIBLE CARD AND
MEMORABILIA HOLDERS, AND SOUVENIR PRO-
GRAMS FOR SPORTS EVENTS. IN CLASS 16 (U.S.
CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 4-30-2000; IN COMMERCE 4-30-2000.

SN 75-722,646, FILED 6-10-1999.

M. E. BODSON, EXAMINING ATTORNEY

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 2,541,067

United States Patent and Trademark Office

Registered Feb. 19, 2002

**TRADEMARK
PRINCIPAL REGISTER**



ST. LOUIS RAMS PARTNERSHIP (DELAWARE
GENERAL PARTNERSHIP)
1 RAMS WAY
ST. LOUIS, MO 63045

FOR: MEN'S, WOMEN'S AND CHILDREN'S
CLOTHING, NAMELY, FLEECE TOPS AND BOT-
TOMS, CAPS, HEADWEAR, T-SHIRTS, SWEAT-
SHIRTS, SHORTS, TANK TOPS, SWEATERS,
PANTS, JACKETS, TURTLENECKS, GOLF SHIRTS,
WOVEN SHIRTS, KNIT SHIRTS, JERSEYS, WRIST-
BANDS, WARM UP SUITS, SWIMWEAR, WIND
RESISTANT JACKETS, RAINCOATS, PARKAS.

PONCHOS, GLOVES, TIES, SUSPENDERS, CLOTH
BIBS, SLEEPWEAR, NAMELY, ROBES, NIGHT
SHIRTS AND PAJAMAS, MITTENS, KNIT HATS
AND CAPS, SCARVES, APRONS, HEADBANDS,
EAR MUFFS AND UNDERWEAR, IN CLASS 25
(U.S. CLS. 22 AND 39).

FIRST USE 4-30-2000; IN COMMERCE 4-30-2000.

SN 75-722,644, FILED 6-10-1999.

M. E. BODSON, EXAMINING ATTORNEY

Int. Cl.: 41

Prior U.S. Cls.: 100, 101, and 107

United States Patent and Trademark Office

Reg. No. 2,443,393

Registered Apr. 10, 2001

**SERVICE MARK
PRINCIPAL REGISTER**



ST. LOUIS RAMS PARTNERSHIP (PARTNER-
SHIP)
1 RAMS WAY
ST. LOUIS, MO 63045

FOR: ENTERTAINMENT SERVICES IN THE
NATURE OF PROFESSIONAL FOOTBALL GAMES
AND EXHIBITIONS; PROVIDING SPORTS AND
ENTERTAINMENT INFORMATION VIA A GLO-
BAL COMPUTER NETWORK OR A COMMERCIAL
ON-LINE SERVICE; ARRANGING AND CONDUCT-
ING ATHLETIC COMPETITIONS; ENTERTAIN-
MENT SERVICES, NAMELY, MUSICAL AND
DANCE PERFORMANCES PROVIDED DURING
INTERVALS AT SPORTS EVENTS; FAN CLUB

SERVICES; EDUCATIONAL SERVICES, NAMELY,
PHYSICAL EDUCATION PROGRAMS; PRODUC-
TION OF RADIO AND TELEVISION PROGRAMS
AND LIVE SHOWS FEATURING FOOTBALL
GAMES, EXHIBITIONS, COMPETITIONS AND MU-
SICAL, COMEDY AND DANCE PERFORMANCES,
IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 4-30-2000; IN COMMERCE 4-30-2000.

SN 75-722,643, FILED 6-10-1999.

JAY NOH, EXAMINING ATTORNEY

Int. Cls.: 16 and 25



Prior U.S. Cls.: 2, 37, 38, 39 and 50

United States Patent and Trademark Office

Reg. No. 1,861,767

Registered Nov. 8, 1994

**TRADEMARK
PRINCIPAL REGISTER**



LOS ANGELES RAMS FOOTBALL COMPANY
(DELAWARE CORPORATION)
2327 WEST LINCOLN AVENUE
ANAHEIM, CA 92801

FOR: TRADING CARDS, POSTERS, MAGAZINES RELATING TO FOOTBALL, POSTCARDS, CALENDARS, WRAPPING PAPER, PAPER GIFT BOXES, PAPER STICKERS, PAPER NAPKINS, PAPER TOWELS, BOOKS RELATING TO FOOTBALL, POSTERBOOKS, NOTEPADS, PAPER HATS AND GREETING CARDS, IN CLASS 16 (U.S. CLS. 2, 37, 38 AND 50).

FIRST USE 9-0-1963; IN COMMERCE 9-0-1963.

FOR: MEN'S, WOMEN'S AND CHILDREN'S CLOTHING AND FOOTWEAR; NAMELY, COACHES CAPS, WOOL HATS, PAINTERS CAPS, BASEBALL CAPS, VISORS, HEAD-

BANDS, EAR MUFFS, KNIT FACE MASKS, BELTS, WRISTBANDS, T-SHIRTS, TANK TOPS, PAJAMAS, GOLF SHIRTS, SWEATERS, SWEATSHIRTS, JACKETS, NECKTIES, BRACES, CLOTH BIBS, JERSEYS, NIGHT SHIRTS, COATS, ROBES, RAINCOATS, PARKAS, PONCHOS, SNEAKERS, GLOVES, SCARVES, SNOW SUITS, MITTENS, APRONS, DOWN JACKETS, LEATHER JACKETS, SHORTS, SWEATPANTS, JEANS, PANTS, KNICKERS, SOCKS, UNDERWEAR, BATHING SUITS AND LEG WARMERS, IN CLASS 25 (U.S. CL. 39).

FIRST USE 9-0-1963; IN COMMERCE 9-0-1963.

OWNER OF U.S. REG. NO. 969,844.

SER. NO. 74-300,714, FILED 8-3-1992.

LINDA E. BLOHM EXAMINING ATTORNEY

United States Patent Office

971,048

Registered Oct. 16, 1973

PRINCIPAL REGISTER Service Mark

Ser. No. 390,681, filed Apr. 29, 1971

RAMS

Los Angeles Rams Football Company (Maryland corporation)
1800 Mercantile Bank & Trust Bldg., Two Hopkins Plaza
Baltimore, Md. 21201, assignee, by mesne assignment
and change of name from
Los Angeles Rams Football Co. (Delaware corporation)
Los Angeles, Calif.

For: ENTERTAINMENT SERVICES—NAMESLY,
PROFESSIONAL FOOTBALL EXHIBITIONS — in
CLASS 107 (INT. CL. 41).
First use 1937; in commerce 1937.

UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, Sam Reed, Secretary of State of the State of Washington and custodian of its seal, hereby issue this

certificate that according to records on file in this office,

trademark:

RAMS

registered in the State of Washington to

ST. LOUIS RAMS PARTNERSHIP

names of partners: (if any)

state of incorporation: (if any) Missouri and I further certify that such trademark with file # 032427 was issued on July 19, 2004 and will expire on July 19, 2009.


I further certify that the classification number of the trademark is 14 and the actual goods or services with which the trademark is used are

jewelry

The date the trademark was first used anywhere is 1996 and the date the trademark was first used in Washington is 1996.

Date: August 10, 2004

Given under my hand and the Seal of the State of Washington at Olympia, the State Capital



Sam Reed, Secretary of State



UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, **Sam Reed**, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

certificate that according to records on file in this office,

trademark:

RAMS HEAD DESIGN MARK

registered in the State of Washington to

ST. LOUIS RAMS PARTNERSHIP

1 RAMS WAY

ST. LOUIS MO. 63045

names of partners: (if any)

state of incorporation: (if any) MO and I further certify that such trademark
with file # 032428 was issued on July 19, 2004 and will expire on July 19, 2009.

I further certify that the classification number of the trademark is 14 and the
actual goods or services with which the trademark is used are

JEWELRY

The date the trademark was first used anywhere is 2000 and the date the
trademark was first used in Washington is 2000.

Date: July 23, 2004

Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital



Sam Reed, Secretary of State



UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, Sam Reed, Secretary of State of the State of Washington and custodian of its seal, hereby issue this

certificate that according to records on file in this office,

trademark:

RAMS HELMET DESIGN MARK

registered in the State of Washington to

ST. LOUIS RAMS PARTNERSHIP

1 RAMS WAY

ST. LOUIS MO. 63045

names of partners: (if any)

state of incorporation: (if any) MO and I further certify that such trademark with file # 032429 was issued on July 19, 2004 and will expire on July 19, 2009.

I further certify that the classification number of the trademark is 14 and the actual goods or services with which the trademark is used are

JEWELRY

The date the trademark was first used anywhere is 1996 and the date the trademark was first used in Washington is 1996.

Date: July 23, 2004

Given under my hand and the Seal of the State of Washington at Olympia, the State Capital



Sam Reed, Secretary of State




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category:[Sports > Fan Shop > Football-NFL > New England Patriots > Other Team Merchandise](#)

New England Patriots Silver Championship Ring

Superbowl XXXVIII Champions

Item number: 2790995479

Buyer or seller of this item? [Sign in](#) for your status[Add to watch list](#) in My eBay[Go to larger picture](#)**Buy It Now** Price: US \$595.00

Time left: **1 days 9 hours**
3-day listing
Ends Mar-02-04
21:36:03 PST

Start time: Feb-28-
04 21:36:03 PST

Quantity: 2 available

History: [Purchases](#)

Item location: Mill Creek, WA
United States

Ships to: United States only

[Shipping and payment details](#)

Seller information

[mauprincess!](#) (26 ★)

Feedback Score: 26

Positive Feedback: 96.4%Member since Aug-16-99 in
United States[Read feedback comments](#)[Ask seller a question](#)[View seller's other items](#)

Purchase Protection

Description



New England Patriots Superbowl Championship Solid Silver Ring

Own a piece of history with this
Patriots solid Silver Superbowl ring.
This huge, man-sized ring weighs in at
55 grams and features cz's.

Each ring features the Patriots logo, and
the words "Superbowl Champions" on the face
and surrounded by cz's. The side proudly
displays the winning score of

their Superbowl victory.

**This edition is limited to 250, and they are
selling fast... so ORDER TODAY!**

**Own and display your loyalty with one of
the finest collectibles available for
the avid Patriots fan!**

Silver ring with cz's is offered at \$595

**10k yellow or white gold ring with CZ's
is available for \$995**

**10k yellow or white gold ring with diamonds
is also available for \$1,695.**

**To order the either of the gold rings
with either diamonds or cz's,
email me for ordering instructions.**

**Whole and half sizes 5 to 14. Larger sizes available
at additional cost. Make sure you order your correct size.**

**We do not offer resizing, refunds or exchanges
if you've ordered the wrong size.**

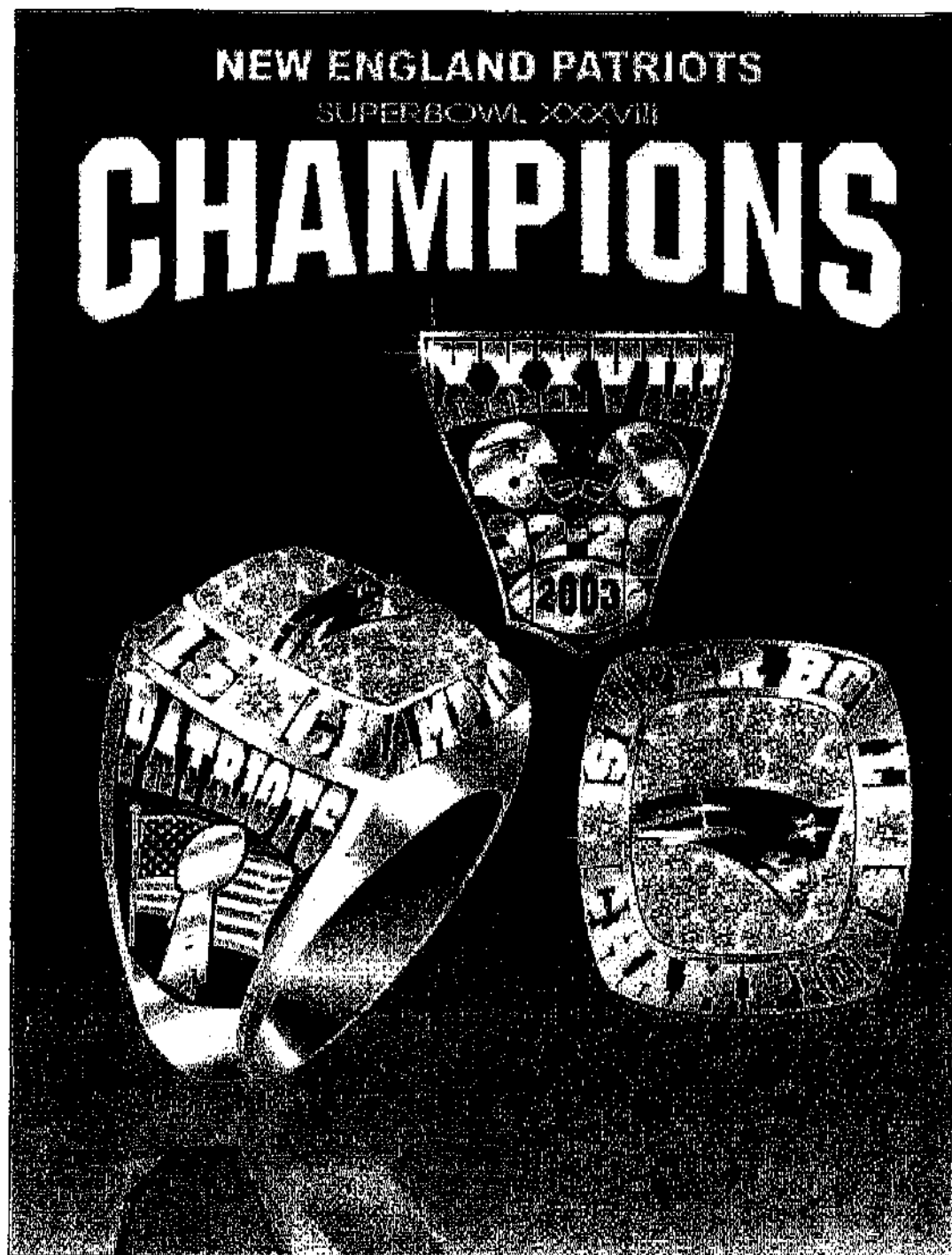
**Sorry, no refunds for any reason. Exchanges
only if item is defective. Replacements will only
be made with same ring.**

Please allow approximately 6-8 weeks for delivery.

**These are selling fast, so ORDER TODAY!
Be one of the PROUD few to own this impressive
New England Patriots Superbowl collectible!**



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Shipping and payment details

Shipping and handling: **US \$25.00** (within United States)
(first item) Buyer pays for all shipping costs

Cost per additional item: US \$0.00

Shipping insurance: US \$20.00 (Required)

Sales tax: 8.900% (only in WA)

Will ship to United States only.

Seller's payment instructions & return policy:

Cashier's check, money orders, and Paypal accepted. NO REFUNDS. Exchanges with same item only if merchandise is defective. Buyer is advised to be sized by a jeweler prior to ordering ring(s). No returns or exchanges if wrong size is ordered. All rings shipped insured via Federal Express. Please make sure to include your ring size with payment.

Payment methods accepted

• **PayPal** (   )

• Money order/Cashiers check

• See item description for payment methods accepted

[Learn about payment methods.](#)

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New England Patriots Silver Championship Ring

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